

Hamilton County Telephone Co-op

Office Procedures

Customer Proprietary Network Information (CPNI)

Below are specific procedures that Hamilton County Telephone Co-op and Hamilton County Communications, Inc. have implemented based on interpretations of the FCC's CPNI rules. The effective date of these CPNI internal procedures is October 22, 2007.

Rules regarding the Form and Notice and how we are following these rules:

- We are using an approved written notice (not oral) that reaches all customers.
- The notice of the customer's right to restrict the use of CPNI was communicated on the same notice as our request for consent (opt-out policy).
- The notice clearly explained the precise steps the customer needed to take in order to deny approval. (Under opt-out, the customer does not need to do anything to communicate approval. Denial or restriction needs to be communicated by the customer.)
- The notice states that denial is valid until revoked by the customer or until the 2-year renewal notice is sent and that denial can be changed at any time.
- The notice clearly states that denial of approval will not affect the provision of services to which the customer subscribes.
- The notice states that the customer has a right, and the carrier has a duty, under federal law to protect the confidentiality of CPNI.
- The notice specifies the types of information that constitute CPNI.
- The notice specifies the entities that will receive the CPNI.
- The notice describes the purposes for which CPNI will be used.
- The notice informs the customer that they have the right to limit or disapprove of those uses and deny or withdraw CPNI approval at any time.
- The notice does not include statements attempting to encourage a customer to freeze third-party access to CPNI.
- The notice is comprehensible, is not misleading, uses sufficiently large type, and is placed in an area that is readily apparent to a customer (included on the bills) to enable the customer to make an informed decision about CPNI use.
- No portion of the notice is translated into another language.

Other Rules

- Our "opt-out" process includes a response method that is available 24 hours a day, seven days a week – at no cost to the customer. Forms can be returned at any time with their payment or can be placed in our afterhours drop box, can be emailed at any time or left on our after-hours recorder that is available on our toll-free number.
- The customer is given a 35-day minimum period of time for the opportunity to opt-out before assuming customer approval to use, disclose, or permit access to CPNI

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(FCC rules require 33 days, if mailed). Mail notification waiting period begins to run on the 3rd day following the date that the notification was mailed.

- The “opt-out” notice is scheduled to be sent out every two years. Our first notice will be sent November 2007 and the next scheduled notice will go out November 2009.
- We will maintain records of our notification for two years. (The FCC rules require at least one year.)

Organizational Checklist

- Prior to using CPNI in marketing campaigns after November 2007, we are implementing a system by which the customer’s CPNI status can be clearly established. Customers are coded so that a warning message appears if the customer has chosen to opt-out. Another warning message appears if the customer has been notified of our opt-out mechanism, but the 35-day waiting period has not expired yet. These warning messages appear as the first screen when inquiring on a customer’s account.
- Relevant employees are trained on the proper use of CPNI including when they are, and are not, authorized to use CPNI. Initial training was conducted in October 2007 and will be conducted annually on these procedures and any relevant changes in FCC regulations pertaining to CPNI.
- We have established a disciplinary process for violations of the CPNI rules.
- We have established a supervisory review process regarding compliance with the CPNI rules for all outbound marketing situations. Specifically, sales/marketing/LD personnel must obtain supervisory approval of any proposed outbound marketing request from the General Manager or Assistant Manager before outbound marketing is sent. We will maintain these records for a period of two years (although the FCC requires maintaining these records for one year.)
- We maintain a record of all campaigns that utilize CPNI. These records include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We maintain these records for two years. (The FCC requires maintaining for one year.)
- We have a current CPNI compliance certificate and statement of explanation filed in our business office in case customers want to review it. These forms will be updated yearly and filed. The Annual Certification is ‘publicly available’ and is located in our Office Procedures manual at the Company’s front desk. This entire plan is kept in the front office in the Office Procedures manual.

Misc. Organizational Checklist

- We did not conduct any marketing campaigns beginning October 22, 2007 until January 2008 when all opt-out customer requests had been coded into the billing system (exclusions to this were campaigns based solely on SLI (Subscriber Line

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Information) and not CPNI. Anything that is or could be included in the telephone directory is not considered to be CPNI but is considered as SLI. And, as such, SLI customers will be included in marketing campaigns regardless of whether they are an opt-out customer (i.e., a customer's name, phone number and address are not considered CPNI). Examples for using SLI, marketing a promotion to all of the customers that live on a particular street, part of town or to the whole population does not require notice and/or consent because addresses are not considered CPNI.

- Examples of CPNI, which would apply are customer-spending information, call detail, access type, calling plan information and may pertain to service quantity, type, technical configuration and destination.
- CPNI Notice Letters with an opt-out form were sent and will be sent to all customers of HCTC and HCCI every two years to allow the customer the ability to opt-out. The first notice was sent October 26, 2007 as direct mail. We have some customers that only receive a bill once a year. Those customers were sent a separate mailing with the Notice and the Opt-out form.
- We will not conduct telemarketing calls even on those customers that have not requested opt-out due to the Illinois 'Do Not Call' list. We will only contact those non opt-out customers through direct mail or e-mail. We can contact an existing customer if it is regarding an existing service as long as we aren't selling/marketing anything new to them.
- We will provide written notice to the FCC within 5 business days of any instance where the opt-out mechanisms do not work properly (when the inability to opt-out is more than an anomaly). Per the FCC rules, this notice will be in the form of a letter and will include the carrier's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether the relevant state commission(s) has been notified and whether it has taken any action, a copy of the notice provided to customers, and contact information.
- If we make CPNI available to joint venture partners or independent contractors, all parties must enter 'confidentiality agreements' that must follow certain guidelines.
- During an inbound or outbound call or customer visit, HCTC may use an oral notice to ask the customer for permission to use CPNI to analyze the customer's account and/or market additional services or special promotions for the customer's existing services. This permission is for a limited, one-time use of CPNI for inbound or outbound customer telephone contacts for the duration of the call only, regardless of whether the customer has chosen the opt-out policy. If the customer gives approval, the approval is good only for the duration of the call, or if the approval is obtained during a customer visit, the approval is good only until the close of that visit. Our oral notice statement consists of:
 - "Do I have your permission to look at all the information available on your accounts with Hamilton County Telephone Co-op while we are on

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this phone call? Or, HCTC has services and plans that may interest you and could save you money. May I discuss them with you?

- If the customer questions why we are asking, our response is:
 - “The FCC has ruled that telecommunications companies have to ask the customer’s permission before looking at the details of their accounts or the transactions in those accounts before we can look to determine if we can save you money by using any of our products/services or a combination of those products/services.”
 - “In November 2007 or on your first bill from us, you were sent information on HCTC’s CPNI Policy. Your response or non-response covered most mailings, etc. However, we do need to ask this when you call in regarding certain subjects.”
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- We do not need to ask for CPNI permission on inquiries concerning a change of address or payment arrangements. Only requests for information regarding features, changes in the products/services used, disconnects, long distance, etc. are subject to the FCC’s CPNI rules.
 - All new HCTC phone customers and all new HCCI customers and HCLD accounts get CPNI notices in their first bill. No marketing based on CPNI will be done on these accounts until the 33-day waiting period has passed. The Quintrex software system will be changed to reflect no CPNI marketing during this temporary period.
 - The CPNI Policy for each company has been posted on our web site www.hamiltoncom.net. E-mail addresses have been set up to submit opt-out requests to: cpni@hamiltoncom.net.
 - CPNI may be used in the process of checking credit on the customer regardless if the CPNI waiting period has expired or not. Credit checks require using a customer’s Social Security Number along with SLI information.
 - An audit will be scheduled annually to ensure compliance with this CPNI plan.